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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

LETRINH HOANG, D.O., PHYSICIANS
FOR INFORMED CONSENT, a not-for-profit
organization, and CHILDREN'S HEALTH
DEFENSE, CALIFORNIA CHAPTER, a
California Nonprofit Corporation,

Plaintiffs,

v.

ROB BONTA, in his official capacity as
Attorney General of California and,
ERIKA CALDERON, in her official capacity
as Executive Officer of the Osteopathic
Medical Board of California ("OMBC"),

Defendants.

Case No: 2:22-cv-02147-DAD-AC

**DECLARATION OF DEBBIE
HOBEL IN SUPPORT
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

Date: January 17, 2023

Time: 1:30 PM

Courtroom: 5, 14th floor (via Zoom)

Judge: Hon: Dale A. Drozd

Action Commenced: December 1, 2022

1 I, Debbie Hobel, declare as follows:

2 **1.** My family currently lives in Ventura County. My son M.H. is a 16-year-old who
3 attends school in Oxnard Union High School District. He is in his junior year.

4 **2.** We are former patients of Dr. Hoang and would gladly make an appointment to
5 see her again to discuss Covid-19. We currently see an Osteopath in our County who is very
6 conventional in his advice and recommendations – he is recommending the Covid-19 boosters,
7 but we want a second opinion from Dr. Hoang. We like our local osteopath a lot (he has a
8 good rapport with my son), but we do want a second opinion.

9 **3.** In our family we are not against Covid-19 vaccination. Each member of our
10 family received Covid-19 vaccinations last year. We are pro informed consent, and I am a
11 health freedom member of the group Physicians for Informed Consent. M.H. received two
12 doses of the Pfizer vaccine. However, after my husband received a Covid-19 vaccine in
13 October 2021, he immediately suffered a sore arm, which then became inflammation
14 throughout his arm and hand. He is a musician so he had to stop playing piano professionally
15 for a while because the adverse reaction has been so bad. He needs to wear splints on his
16 fingers every day. It has been over one year and his fingers still do not function properly. He
17 can now play some piano again but with diminished capacity. It's been really difficult for us.

18 **4.** M.H. has had intermittent breathing problems that have been difficult to
19 diagnose and treat. Our osteopath sent us to a specialist (pediatric pulmonologist), who
20 suggested it could be stress-related but he didn't know.

21 **5.** I am filing this declaration because I want Dr. Hoang to be free to speak
22 candidly with me about her recommendations and how she may see things differently than our
23 local osteopath. In the past, we found Dr. Hoang to be knowledgeable and we trust her. At this
24 point the only thing that stands in the way for us is AB 2098. We're anticipating multiple
25 appointments with Dr. Hoang and our local osteopath and we don't want AB 2098 interfering
26 with our first opinion (local osteopath) or second opinion (Dr. Hoang).

27 **6.** I think our local osteopath is only telling me the CDC's recommendations, so I
28 feel his advice is incomplete for the kind of informed consent that I'm looking for. I fear he

1 might just tell us to take the boosters for fear of board investigation. Either way, it seems like
2 AB 2098 is already stressing out my relationships with doctors. For example, how can I be
3 sure that our osteopath will put my family's health interests above his personal interests so he
4 can stay out of trouble with the board? It's not an unrealistic concern on his part. I sympathize
5 with his situation, and Dr. Hoang's.

6 7. My plan at this point is just to wait to make future medical appointments on
7 Covid-19 vaccines with our osteopath and Dr. Hoang until I know whether AB 2098 is
8 considered unconstitutional in court. If the law is constitutional, I figure there is really no point
9 in me going to Dr. Hoang for a second opinion because I would just get her in trouble asking
10 her for candid advice. I suppose one option would be to travel out of State for a second
11 opinion, but that just seems outrageous. I am hoping a court can fix this for families like mine.

12 I declare under penalty of perjury that the above information is true and correct.
13 Signed this 1st day of December 2022, in Oxnard, California.

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17 Debbie Hobel

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